

1
2
3 THE HONORABLE RONALD B. LEIGHTON
4
5
6
7
8
9
10
11
12

13 UNITED STATES DISTRICT COURT
14 WESTERN DISTRICT OF WASHINGTON
15 AT TACOMA

16
17 TERAGREN LLC, a Washington limited
18 liability company,

19 Plaintiff,

20 v.

21
22 SMITH & FONG COMPANY, a
23 California corporation,

24 Defendant.

25 No. CV7 5612 RBL

26 JOINT MOTION TO EXTEND TRIAL
27 DATES

28 **NOTE ON MOTION CALENDAR:**

29 **AUGUST 13, 2008**

30
31 The parties, Teragren LLC, Smith & Fong Company, Anji Tianzhen Bamboo Floorings
32 Company, Ltd., Bamboo Strand Products, LLC, and Jay Plaehn, hereby jointly move to extend
33 the deadlines set forth in the Court's Minute Order Setting Trial, Pretrial Dates and Ordering
34 Mediation, dated February 7, 2008. The parties respectfully request the following extensions
35 because of the recent addition of claims and parties to the case. Accordingly, the parties request
36 that the Court revise the current case schedule as follows:
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51

<u>Event</u>	<u>Current Deadline</u>	<u>Extended Deadline</u>
6 Days Jury Trial set for 9:30 am on	02/09/2009	04/27/2009
Responsive Briefs on Claim Construction Due:	08/19/2008	09/02/2008
Requested Claim Construction Hearing Date:	09/03/2008	09/23/2008 @ 1:30 pm Note change
Disclosure of Expert Testimony under FRCP 26(a)(2) is due:	08/13/2008	11/14/2008
All Motions related to Discovery must be FILED by:	09/22/2008	12/8/2008
Discovery COMPLETED by	10/14/2008	12/29/2008
Expert Discovery COMPLETED by:	None Set	01/20/2009
Dispositive motions FILED by	11/12/2008	01/26/2009
Settlement conference per CR 39.1(c)(2) HELD no later than:	12/11/2008	10/29/2008
Mediation per CR 39.1(c)(3) HELD no later than	01/12/2009	01/12/2009
CR 39.1(c)(2) Letter of Compliance FILED by:	01/20/2009	01/20/2009
Motions in Limine FILED by And NOTED on the motion calendar no later than the second Friday thereafter	01/12/2009	04/06/2009
Agreed Pretrial Order or Witness and Exhibit Lists are due on:	01/23/2009	04/13/2009
Pretrial Conference HELD at 08:30 AM on	01/30/2009	04/17/2009 Note change
Voir Dire, Jury Instructions, Trial Briefs, Findings	01/28/2009	04/13/2009 Note change

1 Respectfully submitted this 13th day of August, 2008.
2
3

4 /s/ Robert E. Rohde

5 Robert E. Rohde, WSBA No. 12809
6 Email: brohde@rohdelaw.com
7 Rohde & Van Kampen PLLC
8 1001 Fourth Avenue, Suite 4050
9 Seattle, WA 98154-1000
10 Phone: (206) 386-7353
11 Fax: (206) 405-2825

12
13 Attorneys for Bamboo Strand Products, LLC
14 and Jay Plaehn

15 /s/ Elana S. Matt

16 Ramsey M. Al-Salam, WSBA No. 18822
17 RAlSalam@perkinscoie.com
18 Elana Sabovic Matt, WSBA No. 37719
19 EMatt@perkinscoie.com
20 Perkins Coie LLP
21 1201 Third Avenue, Suite 4800
22 Seattle, WA 98101-3099
23 Telephone: 206.359.8000
24 Facsimile: 206.359.9000

25 Attorneys for Plaintiff Teragren LLC

26
27 /s/ Timothy L. Boller

28 Timothy L. Boller, WSBA No. 29079
29 Nima A. Seyedali, WSBA No. 37014
30 SEED IP LAW GROUP PLLC
31 701 Fifth Avenue, Suite 5400
32 Seattle, WA 98104

33 Omid A. Mantashi, WSBA No. 32519
34 Law Offices of Omid A. Mantashi
35 360 Grand Avenue, Suite 90
36 Oakland, CA 94610

37 Attorneys for Defendant Smith & Fong
38 Company and Intervenor Anji Tianzhen
39 Bamboo Floorings Company, Ltd.

40 IT IS SO ORDERED this 21st day of August, 2008.

41 
42 RONALD B. LEIGHTON
43 UNITED STATES DISTRICT JUDGE

44
45
46
47
48
49
50
51 JOINT MOTION TO EXTEND TRIAL DATES
52 (NO. CV7 5612 RBL) – 3

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000